

**EXHIBIT 2**

**REDACTED VERSION  
OF DOCUMENT  
SOUGHT TO BE SEALED**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

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WAYMO LLC,

Plaintiff,

vs.

No. 3:17-cv-00939-WHA

UBER TECHNOLOGIES, INC.;  
OTTOMOTTO LLC; OTTO TRUCKING,  
INC.,

Defendants.

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HIGHLY CONFIDENTIAL ATTORNEYS' EYES ONLY

WAYMO LLC RULE 30(b)(6)

VIDEOTAPED DEPOSITION OF PIERRE-YVES DROZ

PALO ALTO, CALIFORNIA

THURSDAY, AUGUST 3, 2017

REPORTED BY:

ANDREA M. IGNACIO, CSR, RPR, CRR, CCRR, CLR ~

CSR LICENSE NO. 9830

JOB NO. 2663199

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1 [REDACTED] [REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED] [REDACTED] 17:31  
4 MR. KIM: Okay. 17:31  
5 Q And so that's one secret that's disclosed by 17:31  
6 the files of which Exhibit 1286 is a printout; 17:31  
7 correct? 17:31  
8 MR. JAFFE: Object to form. 17:31  
9 THE WITNESS: The -- I mean, that's one thing 17:31  
10 you want to keep secret. So, like, the -- that's -- 17:31  
11 yeah. Go ahead. 17:31  
12 MR. KIM: Okay. 17:31  
13 Q And what's something else that's disclosed in 17:31  
14 the files that you would want to keep secret? 17:31  
15 MR. JAFFE: Object to form. 17:31  
16 THE WITNESS: Okay. So I can -- another 17:31  
17 example of something I want to keep secret, the -- you 17:31  
18 know, the specific -- like, for example, I think one 17:32  
19 example, [REDACTED] [REDACTED]  
[REDACTED] [REDACTED] 17:32  
21 MR. KIM: Q. Where is that? 17:32  
22 A That would be, like, the -- you know, those 17:32  
23 [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
[REDACTED] [REDACTED] [REDACTED] [REDACTED]  
[REDACTED] [REDACTED] is one example 17:32

1 of something we want to keep secret. 17:32

2 Q Okay. 17:32

3 A It took us a while to figure out which one is 17:32

4 the right one, and so -- 17:32

5 Q What else? 17:32

6 A So another example, you know, there is -- you 17:32

7 know, [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] 17:33

19 And so that -- that's something to keep 17:33

20 secret. Those are examples. There are others. 17:33

21 MR. KIM: Q. What else? 17:33

22 A The -- I think, you know, another example is 17:33

23 [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] 17:33

17:34

CERTIFICATE OF REPORTER

I, ANDREA M. IGNACIO, hereby certify that the witness in the foregoing deposition was by me duly sworn to tell the truth, the whole truth, and nothing but the truth in the within-entitled cause;

That said deposition was taken in shorthand by me, a disinterested person, at the time and place therein stated, and that the testimony of the said witness was thereafter reduced to typewriting, by computer, under my direction and supervision;

That before completion of the deposition, review of the transcript [x] was [ ] was not requested. If requested, any changes made by the deponent (and provided to the reporter) during the period allowed are appended hereto.

I further certify that I am not of counsel or attorney for either or any of the parties to the said deposition, nor in any way interested in the event of this cause, and that I am not related to any of the parties thereto.

Dated: August 4, 2017



ANDREA M. IGNACIO,

RPR, CRR, CCRR, CLR, CSR No. 9830